BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania

IN THE MATTER OF:

Cumberland Township Authority	: Docket No. III-2000-101DN
1270 Fairfield Road	: FINDINGS OF VIOLATION
Gettysburg, PA 17325	: AND
NPDES No. PA0024147 & PA24139	: ORDER FOR COMPLIANCE
	:
PROCEEDINGS UNDER	:
SECTION 309(a)(3)	:
OF THE CLEAN WATER ACT,	:
AS AMENDED	:
33 U.S.C. SECTION 1319(a)(3)	:

The following FINDINGS are made and ORDER issued pursuant to the authority vested in the Administrator of the Environmental Protection Agency (hereinafter "EPA") under Section 309(a)(3) of the Clean Water Act, as amended, 33 U.S.C. Section 1319(a)(3) (hereinafter "Act") which authority has been delegated by the Administrator to the Regional Administrator of Region III, and redelegated by the Regional Administrator of Region III to the Director, Water Protection Division of Region III.

FINDINGS OF VIOLATION

1. The Cumberland Township Authority ("Respondent"), a person within the meaning of Section 502(5) of the Clean Water Act, 33 U.S.C. Section 1362(5), owns and operates two sewage treatment facilities (STP) located in Cumberland Township, Adams County, Pennsylvania, which discharge pollutants: the South Plant discharges to Willoughby Run, while the North Plant discharges to Rock Creek.

2. Both Willoughby Run and Rock Creek are navigable waters as set forth in Section 502(7) of the Act, 33 U.S.C. Section 1362(7). Respondent is therefore subject to the provisions of the Act, 33 U.S.C. Section 125! et seq.

3. On or about September 29, 1995, pursuant to Section 402 of the Act, 33 U.S.C. Sec. 1342, and the Pennsylvania Clean Streams Law, as amended, 35 P.S. Sec. 691.1 et. seq., the Pennsylvania Department of Environmental Protection (PADEP) issued to Respondent National Pollutant Discharge Elimination System (NPDES) Permit No. PA0024139 (hereinafter "North Permit") for the North Plant. The North Permit was reissued in April, 2000.

Why is DEP not enforcing this !?

4. On or about September 30, 1997, pursuant to Section 402 of the Act, 33 U.S.C. Sec. 1342, and the Pennsylvania Clean Streams Law, as amended, 35 P.S. Sec. 691.1 et. seq., the Pennsylvania Department of Environmental Protection (PADEP) issued to Respondent National Pollutant Discharge Elimination System NPDES Permit No. PA0024147 (hereinafter "South Permit") for the South Plant, for the discharge of pollutants.

Effluent Violations

5. Part I.B., Page 4, of Respondent's Permits contains effluent limitations for the discharge of pollutants from each Plant, as shown on Attachment A.

6. The Respondent has violated the Permit's effluent limitations at Outfall #001 on numerous occasions since the effective date of the permit, as reported by Respondent on Discharge Monitoring Reports, and as exhibited on Attachment B. On December 2, 1997, PADEP issued a Notice of Violation to Respondent for additional effluent violations (of CBOD & Phosphorus) at the North Plant during May-September, 1997.

7. Inspections of the South Plant conducted by PADEP detected the following violations of the South Permit's Fecal Coliform limit of 3,500/100 ml: March 9, 1995 - 12,000/100 ml; September 10, 1998 - 3,600/100 ml; February 2, 1999 - 37,000/100 ml. In addition, Respondent reported, for May, 1999, a monthly average Fecal Coliform discharge of 635/100 ml, in violation of the Permit limit of 200/100 ml. On December 2, 1997, PADEP issued a Notice of Violation to Respondent for discharges of sewage sludge to Willoughby Run.

8. On February 10, 1998, PADEP reported that Respondent had failed all analyses associated with EPA Quality Assurance testing of STP laboratories; PADEP required that Respondent have "all samples for reporting purposes...sent to a reputable contract laboratory that is running these tests under a USEPA, NPDES testing procedure."

9. On March 21, 2000, EPA conducted a diagnostic evaluation of the North and South Plants. A copy of the Inspection Report is included as Attachment C to this Order. This EPA evaluation determined that certain operational problems, including but not limited to the following, exist at both of Respondent's Plants:

   a. The current process control strategy is inadequate to ensure consistent compliance, and needs to be upgraded.

   b. A preventative maintenance program must be developed. Written schedules, work orders, equipment history, detailed parts inventory, and record keeping need to be improved.

c. Sampling procedures need to be improved. Effluent sampling point must be moved beyond the last unit process. Sampling needs to be extended to cover an 8-hour period. Fecal Coliform samplers must be sterile.

d. The South plant, especially, appears to be "heavy" with "old sludge". Wasting rates need to be re-evaluated.

e. Infiltration/Inflow (I&I) needs to be addressed further. Part of this I&I strategy should include a detailed wet weather flow program for each plant.

10. By failing to properly operate all treatment facilities and systems, and by failing to sample and analyze its discharges in a way that is representative and accurate, Respondent has violated its NPDES Permits. Moreover, because Respondent discharged pollutants from point sources not in compliance with sections 302, 306, 307, 318, 402 or 404 of the Clean Water Act, 33 U.S.C. sections 1312, 1316, 1317, 1328, 1342 or 1344, Respondent has violated section 301 of the Clean Water Act, 33 U.S.C. section 1311.

ORDER FOR COMPLIANCE

AND NOW, this 8th day of June, 2000, Respondent is hereby ORDERED to do the following:

1. No later than ten (10) days after receipt of this ORDER, provide a written response of your intent to comply with this Order.

2. No later than thirty (30) days after receipt of this ORDER, submit a detailed NPDES Reporting Plan that ensures representative and accurate sample collection, preservation and analysis.

3. No later than thirty (30) days after receipt of this ORDER, submit a detailed Compliance Plan, including a schedule for completion, for eliminating effluent violations, especially of Phosphorus, at the North Plant.

4. No later than forty-five (45) days after receipt of this ORDER, develop and implement a detailed Program of adequate and effective preventive maintenance; and submit this Plan to EPA.

5. No later than ninety (90) days after receipt of this ORDER, submit a detailed Plan of Action for each Plant (North and South), including a schedule for completion, which addresses the operational problems addressed in EPA's Inspection Report, including but not limited to improved process control, and adequate sludge wasting.

6. No later than ninety (90) days after receipt of this ORDER, submit a detailed Plan of Action, and schedule, for implementing significant infiltration/inflow reduction.

7. Upon written approval by EPA, the Plans and schedules submitted under Paragraphs 2-6, above, are incorporated into this Order by reference.

8. All submittals required by this ORDER must be addressed and forwarded to:

Jon H. Hundertmark
NPDES Compliance and Enforcement Branch (3WP31)
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, Pennsylvania 19103

A copy of each submittal required by this ORDER must be addressed and forwarded to:

Leon Oberdick
Water Management Program Manager
PA Department of Environmental Protection
909 Elmerton Avenue
Harrisburg, PA 17110-8200

Compliance with the terms and conditions of this ORDER shall not in any way be construed to relieve Respondent of its obligation to comply with any applicable Federal, State, or local law.

Violation of the terms and conditions of this ORDER constitutes an additional violation of the Act, and may result in a civil action for injunctive relief or a penalty not to exceed $27,500 per day of such violation, pursuant to Sections 309(b) and (d) of the Act, 33 U.S.C. Section 1319(b) and (d). In addition, Section 309(c) provides criminal sanctions for knowing or negligent violations of the Act including imprisonment and fines of up to $50,000 per day of violation.

This ORDER is effective upon receipt.

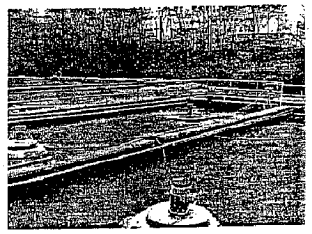
Date: 6/8/2000

for Joseph T. Piotrowski, Acting Director
Water Protection Division
EPA, Region III

CUMBERLAND TOWNSHIP AUTHORITY
ADAMS COUNTY, PENNSYLVANIA
DIAGNOSTIC EVALUATION

On March 21,2000, a diagnostic evaluation was conducted at the Cumberland Township Authority Wastewater Treatment Plants. Jon Hundertmark and Jim Kern from EPA, Region 3 and Durand Little of the PaDEP conducted the visit.

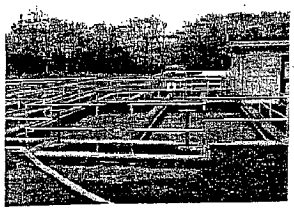
Todd Williams, Chief Operator, was present for the evaluation visit. In addition, to the Chief Operator, two additional operators are employed, one at each plant, plus the retired former operator that works part time.



Floating aerators in two of the aeration tanks in the South Plant

As indicated, the Township owns two facilities.

South Plant - An extended aeration plant with a capacity of approximately 239,800 gpd. The plant consists of a comminutor / bar screen by-pass, four sets of aeration tanks and clarifiers, chlorination and de-chlorination. Aerated sludge holding tanks are available to store wasted sludge until land applied.



Aeration tanks at the North Plant

North Plant - Also an extended aeration plant with a capacity of approximately 167,000 gpd. Constructed very similar to the South plant, it has a comminutor with bar screen by pass, four sets of aeration tank / clarifiers, chemical addition, chlorination, and intermittent sand filtration. Aerated sludge holding tanks are available to hold the wasted sludge until trucked to the South plant.

Both plants are run identical to each other so these comments will apply to both unless stated.

Process Control

The operators process control strategy is limited to running daily Mixed Liquors Suspended Solids on each aeration tank. While it is commendable to invest the time to undertake daily MLSS tests, two problems exists:

1. The equipment being used is faulty or out of calibration. The drying oven's thermometer must be placed in sand or other suitable material to keep its reading constant. Also, the Mettler balance needs to be calibrated.

2. This strategy does not consider sludge quality in the system. The sludge may be too old or too young. It is not possible to determine proper wasting rates or return rates based solely on one test.

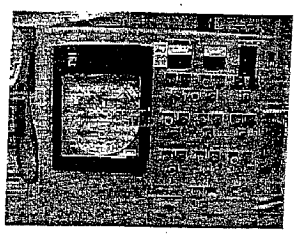
The staff also runs the following tests: pH, Cl_2, dissolved oxygen (done from a grab sample). The dissolved oxygen test needs to be run more often than weekly (try daily) and the results must be recorded.

I strongly recommend that the Authority adopt the "Al West" method to control their activated sludge process. This method includes observations of each tank, settleometer readings, sludge blankets, centrifuge spins, microscopic examination, and dissolved oxygen readings. With this information, sludge wasting and return rates can be calculated. Obtaining the book Controlling Your Activated Sludge Process" by Tim Hobson is strongly recommended.

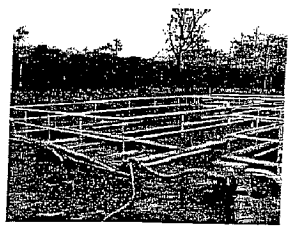
The flow charts are used for multiple weeks. Charts are usually designed for 24 hour service or 7 day service. Cumberland's 7 day flow charts are re-used to the point it makes it too difficult for anyone to use them.

Sludge is returned from the clarifier to the aeration tanks by the use of air lifts. Unfortunately, there are no controls on the return. It is not possible to vary the rate of return. This causes two problems; first is the unnecessary hydraulic load on the aeration tank, and second, the wasted sludge can not be thickened before transfer to the holding tanks. Extra work is required of the operator to decant more often in order to fully utilize the holding tanks.

It is recommended that a solenoid valve be installed in the air line. The valve is then attached to a timer that can activate the valve in minute increments each hour. In addition, a ball valve that can control the amount of air should also be included. The operator will then have the ability to obtain a thicker sludge in the bottom of the clarifier. (A bypass around the valve should also be installed.) The operator may see the recommended modification in action at the Fairfield WWTP just a short distance from this plant.



Flow chart - South Plant



Decanting holding tanks - North Plant

Air piping for Return Sludge - suggested site for valving modifications.

Maintenance Management

A written log is kept of all maintenance performed. Unfortunately, the system being used is inadequate.

The Authority needs to develop a preventive maintenance program. This program will have each piece of equipment logged with information such as installation date, purchase price, routine maintenance to perform, frequency, special equipment and materials needed. Separate from this is the maintenance history. While history of work is currently logged, it needs to be logged by equipment. Sorting maintenance this way will give the Authority equipment histories. Problem machinery can be readily be determined. Maintenance budgeting will be made simpler.

The Authority does have a limited spare parts inventory. However, with a maintenance program and equipment repair history, the inventory can be cut back to what is needed more often as well as those requiring long lead time.

The argument that we will be building a new plant soon should not prevent the development of an adequate program at the existing facility. Construction completion is more than a year away. I fear the resistance to developing an adequate maintenance program now may carryover to a new plant, when the argument will be, its too new to require maintenance yet.

Laboratory Management

The NPDES lab tests (other than grab samples) are collected by the operators for a contract lab.

Composite samples are manually collected from all four clarifies at 8am, 10am, noon, and 2pm. They are manually flow proportioned and stored in a refrigerator at 4°C. Refrigerator temperatures are recorded and initialed. Sample times and amounts are recorded and initialed.

The following problems were discovered in the sampling procedures:

1. Sampling points are incorrect. Samples must be collected after all unit processes. This means at the point after de-chlorination.
2. Sampling container is not sterile and cannot be used for the fecal coliform test.
3. Sampling is done over a six hour period, not eight hours as required by permit.

The pH meter is calibrated daily at 7 & 10. Procedures for this testing was not observed.

The DO meter is calibrated daily. Again this procedure was not observed. It is suggested that the staff purchase a D.O. field probe and 20' of cable. While bringing a sample into the lab for analysis is acceptable, a field probe will allow for more accurate readings of the aeration tank. In addition, tank D.O. profiles can be conducted. This will tell the operator about the efficiencies of the aeration system and if they have any dead spots in the system.

Observations, Comments & Conclusions

1. I fear that the bad habits formed in the existing plant will carry over into the new proposed SBR facilities. Therefore it is imperative that the Cumberland Township Wastewater Treatment Plant staff immediately re-evaluate their operations.

2. A more sophisticated process control strategy is required to operate this and their future facilities. What is being done is very simple and will not account for many possible scenarios.

3. A preventative maintenance program must be developed. Written schedules, work orders, equipment history, detailed parts inventory, and record keeping are all part of an adequate program for a wastewater treatment plant.

4. Sampling procedures need to be improved. Sampling point must be moved beyond the last unit process. Sampling needs to be extended to cover an 8 hour period. Fecal Coliform samplers must be sterile. The plant has the necessary whirl paks in an adequate supply. Use them.

5. The purchase of a field D.O. probe with a 20 foot cable is recommended. D.O. reading can then be conducted in the tanks and tank profiles can be developed.

6. The South plant could become "heavy" with "old sludge". Wasting rates need to be re-evaluated.

7. The Infiltration/Inflow problem needs addressing. Part of this strategy includes a detailed wet weather flow program for each plant. One should be developed for the South Plant.

Questions on this report should be directed to Jim Kern at 215-814-5788

In conclusion and in accordance with Chapter 94, Section 94.51, we hereby request that the Cumberland Township Authority be granted an exception of any restrictions on future sanitary sewer connections for the following reasons; (1) Township has completed the 537 Facilities Plan, (2) the Cumberland Township Authority has completed a significant portion of sanitary sewer reconstruction in 1998, (3) the Municipal Authority is expecting to have an enlarged wastewater treatment facility on line in accordance with the schedule as provided herein, and (4) although flows occasionally exceed design capacity, treatment efficiency continues to exceed that required by the NPDES permit, except for phosphorus.

In the last three years, the average 3-month peak flow has only exceeded the design flow once and that year the annual precipitation was over 20 inches above normal. Even so, in 1996 the peaking factor (1.18) was less than in 1993 (1.48) and 1994 (1.36) when precipitation was only slightly above normal. This seems to be an indication that improvements in the collection system have reduced infiltration and inflow.

Continued growth in Cumberland Township is needed to help offset the costs of the plant expansion. Connection fees can be used to reduce the capital costs of the project and additional users disperse the annual costs, reducing the cost to the individual user. Therefore the Cumberland Township Authority hereby requests that the PA DEP approve the request to authorize the issuance of permits for the equivalent of 45 EDU's.

a8

ER – RWO – 168: Appendix A: 7/93

Department of Environmental Resources	NPDES Compliance Inspection Report	Water Management Program

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspection Type	Inspector	Fac Type
1 N 2 5	3 PA 0025417 11	12 940308 17	18 R	19 5	20 1

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time/Date	Permit Effective Date
CUMBERLAND TWP. AUTH. — SOUTH PLANT RT. 116	11:00	2-26-92
Municipality / **County**	Exit Time/Date	Permit Expiration Date
CUMBERLAND TWP. / ADAMS		2-26-97
Name, Address of Responsible Official	**Title**	
LAWRENCE J. HELTZEL	AUTH. MGR.	
1370 FAIRFIELD RD. (C.T.M. BLDG.)	**Telephone**	**Contacted**
GETTYSBURG, PA. 17325	717-334-6483	Yes ☒ No ☐

Section C: Areas Evaluated During Inspection

(S = Satisfactory, I = Improvement Needed, U = Unsatisfactory, D = Does Not Apply, Blank = Not Evaluated)

___ Permit Verification	5 Flow Measurement	5* Effluent/Receiving Waters
___ Compliance Schedule	___ Laboratory/QA	I Operation/Maintenance
___ Records/Reports	___ Self-Monitoring Program	___ Pretreatment
___ Other (Specify):		

Section D: Summary of Violations/Recommendations/Comments (Attach additional sheets if necessary)

VIOLATIONS:

— HYDRAULIC OVERLOAD STATUS AT THIS TIME.

* FECAL COLIFORM EXCEEDING LIMIT OF 3,500 — 190,000.
TRACE CHLORINE RESIDUAL DUE TO HIGH FLOW.

— CALLED L. HELTZEL 3-18-94. FLOW STILL UP —
.400± MGD.

Inspector Name	Inspector Signature	Title	Date / Telephone
DURAND R. LITTLE	Durand R. Little	WQS	3-8-94 / 717-657-4535
Name of Person Interviewed (E. BAKER, R. TRIMMER, J. KUNKEL)	**Signature of Person Interviewed**	**Title**	**Date / Telephone**
L. HELTZEL	Lawrence J. Heltzel	AUTH. MGR.	3-8-94 / 717-334-1506

This document is official notification that a representative of the Pennsylvania Department of Environmental Resources, inspected the above facility. The findings of this inspeciton are shown above and on any attached pages.

Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses of the discharge and review of Department records. Notification will be forthcoming, if such violations are noted.

REGIONAL OFFICE

5

Water Quality Management Program
PLANNING MODULE ROUTE SLIP

C:\DOCUMENTS\ROUTE.wpf - Modified

( ) 1st, (X) 2nd Submissio
Current Receipt 12-2-94
Due Date 2-12-95
Extended

RECEIVED
DEC 2 9 1994
DER-SOUTHCENTRAL REGION
Water Management Program

County Adams
Municipality Cumberland
DER Code No. 38-0410-[illegible]

RECOMMENDED ACTION

Faxed

COPIED AND SENT TO DISTRICT OFFICE
DATE 12-30-95

Route:	INITIAL/DATE	APPR	DISAPP	INC
1. County	KBA 12-28		X	
2. Regional Log-In	KBA 12-30-94			
3. Sew. Fac. Consultant	CDF 1-4-95		X	
Planning Eng.	KMC 1/3/95	X		
Hydrogeologist				
Soil Scientist				
4. Chief, Planning	[illegible]	X	?	
5. Program Manager	[illegible]			
6. Sew. Fac. Consultant		Approve with std Conditions		
7. Regional Log-Out				
8. County				

for signature of Program Manager Y__ N__

<-- FINAL ACTION THIS REVIEW

Publish Final Approval in PA Bulletin Y__ N__

NAME OF PROJECT/SUBDIVISION AND DESCRIPTION: Thomas Kraniak /
3 Lot SFR subdivision on 7.2 acres. The project will be served by Public sewer and water (1050 GPD) trib. to the Cumberland Twp sewer Plant #3

COMMENTS/INFORMATION/QUESTIONS (please initial):

1) This project has been disapproved twice before. I have enclosed a copy of the most recent disapproval letter. If the receiving plant is overloaded, why are they issuing permits? & Why did they issue permits prior to the planning? If Since this guy has his permits to connect, doesn't that make any future disapproval letter a farce? AA

( ) STANDARD COMMENTS ( ) SPECIFIC COMMENTS ( ) ADDITIONAL COPIES

COMMONWEALTH OF PENNSYLVANIA
Department of Environmental Protection
Southcentral Regional Office
February 9, 1998
717-657-4101

SUBJECT: National Park Service
Gettysburg Borough and Cumberland Township, Adams County

TO: Charles Ferree
Water Quality Specialist Supervisor

FROM: Kevin S. McLeary
Project Engineer

THROUGH: Edward J. Corriveau
Chief, Planning and Finance Section

This project involves the replacement of preregulatory OLDS systems to serve several areas of the National Park Service - Gettysburg National Military Park. The replacement will involve sewer extensions and holding tanks. The sewer extensions will be tributary to the Gettysburg Municipal Authority's treatment plant and both Cumberland Township treatment plants. The holding tank waste will be trucked to the Gettysburg plant for treatment.

The Gettysburg Municipal Authority is under a Consent Order and Agreement to upgrade the sewage treatment plant. They have an approved plan and schedule, and have submitted a Water Quality Management Part II permit application for the expansion. This portion of the project may be approved.

Both of Cumberland Township's treatment plants were extremely overloaded in 1996. They have submitted their Chapter 94 reports for 1997, and do not show the plants to be in an existing overload in 1997. They are claiming that this is due to the rehabilitation work that was done. They have indeed been replacing much of the sewer line tributary to the North plant, but the drought also must have had a significant effect on the flows. The Township was to have submitted their Act 537 plan by December, 1995, making the plan over two years overdue. The National Park Service indicates that the systems are being replaced because they are inadequate to meet the needs of the park. If this is indeed the case, the Cumberland Township portion of the project may be approved under the provisions of Section 94.57 of Chapter 94, relating to the elimination of public health hazards.

but 98 99 2000 2001
all overloaded

ROUTE TO:

Planning______

Operations D 4/21/95

Facilities______

RWQM______

On Overload Report?

(X) Yes ( ) No

If yes, give this report priority action.

Year 1994

Case Cumberland – South

County Adams

Date Rec'd 2/16/95

WASTELOAD MANAGEMENT REVIEW AND RECOMMENDATIONS

Accept	Reject	Accept w/Comment	AIR	Signature	Date
		x		Kevin S McGeary	3/9/95
	X			[signature]	6/5

Comment page attached: This page is to be used for comments which the reviewer wants sent to the permittee to request additional information or to indicate information to be included in next years report. Comments mus be addressed to the permittee and be self explanatory so editing is not required. Include your name with the comments so the reviewer can be contacted if there are questions.

Return reports to KMcGeary or by 4/15/95

Internal Comments: They should submit data for all years. We should have a map of the sewer system indicating the surcharged areas & developments. They are currently working on an Act 537 Plan which should be completed by December. This plant should still be considered to be overloaded. The 1994 1-month max organic loading is incorrect in the table.

✓ Dec. 94 DMR – OK BOD load

✓ They use 94 flow + BOD max (not 5 yr avg) as basis for projections (proj. are too high)

✓ Existing hyd + org overloads – no plan to limit connections –

(DO OVER) Dab 5/30/95

LINCOLN ESTATES/RT. 30 PUMP STATION HAS BEEN OVERLOADED SEVERAL TIMES IN '94, WHICH RESULTED IN SURCHARGING OF COLLECTION LINES W/IN LINCOLN ESTATES. I/I STILL CAUSING OPERATIONAL PROBLEMS – POLYMER ADDITION HAS BEEN REDUCING CARRY OVER. THIS SITE ACCEPTS QUITE A BIT OF HOLDING TANK & SEPTAGE(?) WASTEWATER. D. LITTLE 4/21/95

– WEEKLY, 8HR. COMPOSITE SAMPLING HAS PROBABLY MISSED SOME SIGNIFICANT DISCHARGE VIOLATIONS (SEE p. [illegible])

Planning____________

Operations [illegible] 4/21/95

Facilities____________

RWQM____________

On Overload Report?

(✓) Yes ( ) No

If yes, give this report priority action.

Year 1994

Case CUMBERLAND – NORTH

County ADAMS

Date Rec'd 2/16/95

WASTELOAD MANAGEMENT REVIEW AND RECOMMENDATIONS

Accept	Reject	Accept w/Comment	AIR	Signature	Date
		x		[illegible]	3/9/95
	X			[illegible]	6/5

Comment page attached: This page is to be used for comments which the reviewer wants sent to the permittee to request additional information or to indicate information to be included in next years report. Comments mus be addressed to the permittee and be self explanatory so editing is not required. Include your name with the comments so the reviewer can be contacted if there are questions.

Return reports to KMcLeary or by 4/15/95

Internal Comments: They should submit data for all years. The hydraulic projections are based on the actual flow of 337 gpd/EDU, while the organic projections are based on an arbitrary flow of 270 gpd/EDU. We should have a map of the sewer system showing proposed and/or planned developments. Still overloaded organically.

- DEC 94 – BOD load OK
- They use 94 FLOW + BOD conc. (NOT 5 YR AVG) AS BASIS FOR PROJECTIONS
- I.W. section should discuss type of I.W. discharges, how inspected by twp + any problems.
- No discussion of sewer overflows + basement backups in '94
- Existing H + O o-loads not acknowledged – No connection limitations discussed
- → P. 12 Do we allow subtraction of flow from projections for anticipated I/I removal?

(SEE OVER) [illegible] 3/30/95

I/I SEVERE WITH ANY SUSTAINED RAINFALL. EX/ FLOW IS .478 MGD FOR 3-8-95. TABLE ROCK RD. BASEMENT FLOODING SITUATION APPARENTLY CORRECTED W/A "CHECK VALVE". Pg (7) – NO EFFLUENT VIOLATIONS — WEEKLY AVE. COMPOSITES HAVE UNDOUBTEDLY MISSED SOME SUBSTANTIAL NON-COMPLIANCES. I/I REDUCTIONS QUESTIONABLE.

D. LITTLE 4/21/95

CUMBERLAND TWP AUTHORITY------

NORTH PLANT

YEARS	HYDRAULIC LOADING CAPACITY- 0.167 MGD OVER LOADED?	EDU's	ORGANIC LOADING CAPACITY - 292 #/DAY OVER LOADED?	
2001	NO	45	NO	
2000	YES	45	YES	
1999	NO	45	YES	
1998	YES	45	YES	
1997	NO	35	YES	
1996	YES	35	YES	
1995	NO	35	YES	
1994	NO	25	YES	
1993	NO	25	YES	
1992	NO	20	YES	
	DMR,S VIOLATIONS			
2001	5/01 – AMMONIA OUT OF RANGE (CONCENTRATION) 6/01 - AMMONIA OUT OF RANGE (CONCENTRATION)			
2000	12/00 – TOTAL SUSPENDED SOLID OUT OF RANGE (LOADING) 5/00 – COLIFORM, FECAL GENERAL OUT OF RANGE (CONCENTRATION)			
1999	8/99 – PHOSPHORUS OUT OF RANGE (CONCENTRATION) 6/99 - PHOSPHORUS OUT OF RANGE (CONCENTRATION)			